

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BABCOX MEDIA, INC.,)	CASE NO.: 5:19-cv-01786
)	
Plaintiff,)	JUDGE SARA LIOI
)	
vs.)	
)	
TFI ENVISION, INC., <i>et al.</i> ,)	
)	
Defendants.)	
)	

MOTION TO DISMISS

Defendant TFI Envision, Inc. moves this Court, pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, for an order dismissing with prejudice Plaintiff's Complaint as to it. The Complaint fails to allege facts sufficient to establish personal jurisdiction over the moving defendant and fails to state a claim on which relief may be granted. In support of this motion, TFI Envision, Inc. submits the accompanying memorandum of law and the accompanying declaration of Elizabeth P. Ball.

Dated: January 15, 2020

Respectfully submitted,

/s/ Scott D. Simpkins
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